



Flair Finance

Credit Guide and Privacy Statement

ABOUT US (“I”, “we, us, our”):

Credit Representative	Kirsty McKinnon (“broker”) Credit Representative 437539
Contact Details for Credit Representative	Address: 21 Roper Street Dubbo NSW 2830 Phone: 02 68845050 Email address: kirsty@flairfinance.com.au
An employee or representative of:	
Licensee	ratesonline.com.au Pty Ltd ACN 122 052 582 (“ROL”) Australian Credit Licence: 384404 Level 5, 278 Collins Street Melbourne VIC 3000 Tel: 1800 282 652 Trading as “Freedom Aggregation”
Broker Group	Pennley Pty Ltd ACN 071 979 498 as trustee for the Pennley Unit Trust Credit Representative Number: 392528

This document provides you with information relating to our activities and those of our Credit Representatives. It contains information about various fees and charges that may be payable by you to us, as well as about certain commissions we may receive from a licensee when we are acting as a provider of credit assistance services, or commissions that we pay to certain third parties. It also contains information about what you should do if you have a complaint or dispute in connection with the services provided by our Credit Representative.

WHAT IS A CREDIT REPRESENTATIVE?

A 'Credit Representative' is a person who has been authorised by a credit licensee to engage in specified credit activities on behalf of the licensee. Our licensee is ROL.

WHAT IS CREDIT ASSISTANCE?

We give you credit assistance when:

- we assist you to apply for a particular loan or lease;
- we suggest you apply for a particular loan or lease (or suggest you apply for an increase to an existing loan); or
- we suggest you remain in your current loan or lease.

THE ASSESSMENT WE NEED TO COMPLETE BEFORE GIVING YOU CREDIT ASSISTANCE

Before we provide credit assistance to you, we assess whether the particular loan or lease is suitable for you. To do this, we need to make reasonable enquiries and verify that:

- the loan or lease or increase will meet your requirements and objectives; and
- you can meet the proposed repayments; and
- the loan or lease is in your best interests.

We will not be able to give you credit assistance if our assessment shows that:

- you will not be able to meet the proposed repayments without substantial hardship; or
- the loan or lease will not meet your requirements or objectives; or
- the loan or lease is not in your best interests.

OBTAINING A COPY OF OUR ASSESSMENT

If we provide you with credit assistance, you can ask us for a copy of our assessment any time up to 7 years after we provide you with a credit assistance proposal. To request a copy, please contact us. We will provide you with a copy:

- within 7 business days of the date on which we receive your request – provided you make the request within 2 years of the date of our credit assistance proposal; or
- otherwise, within 21 business days of the date on which we receive your request.

INFORMATION ABOUT THE LICENSEE AND ITS CREDIT REPRESENTATIVES

The broker named acts as a credit representative for ROL. The broker is authorised to engage in credit activities, including providing credit assistance on behalf of ROL.

Subject to meeting credit criteria, we are able to assist you to obtain loans and leases for you from a broad range of lenders and lessors through our Broker Group. Our Broker Group does not require us to recommend any particular lender and our Broker Group does not set any quotas or obligations on us relating to recommending any particular product.

The lenders to which ROL brokers have access for the submission of loan applications are:

Mortgage Loans

Adelaide Bank	Choice Excel	Macquarie Bank
AMP Bank	ChoiceLend	ME Bank
ANZ Bank	Citibank	Money Quest Home Loans
Australian Financial	Commonwealth Bank	Mortgage Mart
Australian Unity Bank	Credit Union SA (SA only)	MyState Bank
Auswide Bank	Emoney	National Australia Bank
Bank of China	Firstmac	P&N Bank
Bank of Melbourne (Vic only)	Heartland Seniors Finance	Pepper Money
Bank of Queensland	Heritage Bank	Resimac
BankSA (SA only)	HomeStart Finance (SA only)	St George Bank (excl SA, Vic)
Bankwest	Hume Bank	Suncorp
BC Investments	ING Direct	Teachers Mutual Bank
Better Choice Home Loans	Keystart Finance (WA only)	UBank
Beyond Bank	La Trobe Financial	Virgin Money
Bluestone Mortgages	Liberty Financial	Westpac
Choice Custom	Loan Avenue	

Personal Loans

Latitude Financial
Pepper Money
Platform Finance
Plenti
uFinance

Asset Finance

Mac Leasing
Mason Lane Finance
NLG Leasing
Paramount Leasing
Pepper Money
Platform Finance
uFinance

Lender accreditations

The broker named is accredited to submit mortgage loan applications to these lenders:

Adelaide Bank	Commonwealth Bank	MyState Bank
AMP Bank	Emoney	National Australia Bank
ANZ Bank	Heritage Bank	Pepper Money
Bank of Queensland	Hume Bank	Resimac
Bankwest	ING Direct	St. George Bank
Better Choice Home Loans	La Trobe Financial	Suncorp
Beyond Bank	Liberty Financial	Teachers Mutual Bank
Bluestone Mortgages	Macquarie Bank	Westpac
ChoiceLend	ME Bank	

The top six (6) mortgage loan lenders the broker named is likely to conduct business with, based on settlement volumes for the 2021-2022 financial year, are:

1	Bankwest	21.77%
2	Commonwealth Bank (CBA)	17.01%
3	ChoiceLend	12.24%
4	Heritage	10.88%
5	Bank First	9.52%
6	My State	7.48%

The top six (6) mortgage loan lenders for ROL overall, based on paid settlement volumes for the 2021-2022 financial year, are:

1	Commonwealth Bank (CBA)	11%
2	Macquarie Bank	9%
3	Westpac	8%
4	ANZ Bank	8%
5	Bank of Melbourne	7%
6	National Australia Bank (NAB)	7%

OWNERSHIP

ROL	ratesonline.com.au Pty Ltd is 100% privately owned with no shareholders being panel lenders.
CHOICE (BROKER GROUP PENNLEY)	<p>We obtain mortgage aggregation services from the Broker Group. The Broker Group is a member of the Loan Market Group. The Broker Group provides services at arm's-length to our business which include IT systems, loan information and lodgement systems, training and development, commission processing, conferences and professional development events and assistance with regulatory and compliance obligations. In consideration of the services the Broker Group gives us, we pay fees to the Broker Group or the Broker Group retains some of the commission panel lenders pay on loans we arrange. We have access to the Broker Group panel of lenders.</p> <p>Our business is owned and managed independently from the Broker Group.</p>

FEES AND CHARGES

FEES PAYABLE FOR THE PROVISION OF CREDIT ASSISTANCE

We may charge a fee for providing credit assistance. More detail about those fees will be set out in a Quote we will give to you before we provide you with credit assistance.

FEES PAYABLE IN RELATION TO ACTING AS A CREDIT REPRESENTATIVE

The broker named may receive remuneration from ROL and/or the Broker Group and does not charge you any fees or charge in relation to acting as a Credit Representative in relation to residential mortgage loans.

OTHER FEES AND CHARGES

You may have to pay other fees and charges (such as an application fees, valuation fees and other fees) to the lender, lessor or other parties. You should review the disclosure documents and your loan contract or lease for further details of any such fees and charges.

COMMISSIONS

COMMISSIONS WE RECEIVE FROM OUR LICENSEE

ROL has appointed our Broker Group as its agent to receive commissions from lenders and lessors and to pay us commission in relation to loan contracts or leases for which we act as a Credit Representative and provide credit assistance. The total amount of commission we may receive in relation to your loan or lease may vary depending on the lender or lessor, the term, the features, the amount of the loan or lease you ultimately choose and the amount and timing of the repayments that you make.

Loan contracts such as home loans, investment property loans, personal loans and asset finance

Upfront commission payable by lenders in relation to home loans and investment property loans is calculated as a percentage of the loan amount and is generally in the range of 0.0% and 0.8% of the loan amount. It is usually paid after settlement of the loan.

Trail commission payable by lenders in relation to home loans and investment property loans is generally calculated regularly (monthly, quarterly, bi-monthly or annually) on the outstanding loan balance and is paid in arrears. The trail commission payable by lenders is generally in the range of 0.0% per annum and 0.3% per annum of the outstanding loan amount.

Leases

Upfront commission payable by lessors in relation to leases is calculated as a percentage of the lease amount and is generally in the range of 0% and 4% of the lease amount. It is usually paid after settlement of the lease.

Trail commission is generally not payable in relation to leases.

Further details of the commission earned by us will be included in the Credit Proposal disclosure document we will provide to you at the same time as we provide you with credit assistance.

You can request information from us about the fees that we are likely to receive, how those fees are calculated, and our reasonable estimate of the fees or commissions that will be payable.

NON-FINANCIAL BENEFITS

We and our Broker Group do not receive any volume-based benefit for residential home loan products. However, from time to time, we or our Broker Group may receive a benefit, directly by way of cash bonus or additional commissions or indirectly by way of training, professional development days or sponsorship, if we or our Broker Group write a particular volume of loans offered by lenders for products such as commercial and lease products.

COMMISSIONS PAYABLE BY US

If a third party has introduced you to us or referred you to us, we may pay them a commission or a fee.

We obtain referrals from a range of sources, including real estate agents, accountants, financial planners or other people.

Further information about referral commissions, including our reasonable estimate of the amount of any commission payable and how it is calculated, is available from us on request and will be included in the credit proposal disclosure we will supply to you when we provide you with credit assistance.

DISPUTES OR COMPLAINTS

WHAT TO DO IF YOU HAVE A DISPUTE OR COMPLAINT

We are committed to providing our customers with the best possible service. If at any time we have not met our obligations – or you have a complaint about any of our services – please inform us so we can work towards a resolution. We will endeavour to deal with your complaint promptly, thoroughly and fairly.

HOW TO MAKE A COMPLAINT AND THE COMPLAINTS PROCESS

If you have a complaint, we request you follow these steps:

1. In the first instance, please contact your credit assistance provider.
2. If your complaint has not been resolved to your satisfaction within 5 business days, please contact our Complaints team as detailed below:

Telephone: 03 9013 8344 Monday to Friday 9:00am to 5:00pm (AEST)

email: compliance@freedomaggregation.com.au

Mail: Complaints Manager, Freedom Aggregation, PO Box 263, Flinders Lane Vic 8009

3. We may ask for additional information and request you to put your complaint in writing to ensure your issue is properly investigated.
4. In cases where your complaint will take longer to resolve, we will update you progressively.

THIRD PARTY PRODUCTS OR SERVICES

If your complaint relates to a product or service acquired through a third party (for example, a lender) we may ask you to contact the relevant third party. It will deal with your complaint under its complaint resolution process.

If you are not satisfied with the resolution of your complaint by the third party under its complaint resolution process, you are entitled to have your dispute considered by the Australian Financial Complaints Authority. Please contact the third party for further details.

KEEPING YOU INFORMED

Our Complaints Area will acknowledge receipt of your complaint within 5 business days. If unable to resolve the complaint/dispute to your satisfaction within 5 business days, we will write to you advising the procedures we will follow in investigating and handling your complaint.

Within 30 calendar days of the date on which you lodged the complaint with us, we will write to you advising you the outcome of the investigation and the reason/s for our decision, or if required, we will inform you if more time is needed to complete the investigation.

IF YOU ARE STILL NOT SATISFIED

If you do not think we have resolved your complaint to your satisfaction, you may take the matter – free of charge – to the relevant External Disputes Resolution Scheme (provided it is within the scheme’s terms of reference) as detailed below. You may also refer the matter to the relevant External Disputes Resolution Scheme at any time, but if our internal process is still in progress, it may request that our internal processes be completed before considering the matter further.

Our external dispute resolution service provider is the Australian Financial Complaints Authority (AFCA), which can be contacted via:

- Online: www.afca.org.au
- email: info@afca.org.au
- Phone: 1800 931 678
- Mail: GPO Box 3 Melbourne VIC 3001

OTHER DISCLOSURES

BROKER BENEFITS DISCLOSURES

In line with industry standards, we are required to keep a register of benefits received from any lenders or aggregators to the value of \$100 or more, which is kept current (over a rolling 12-month period and housed for 3 years). In the interest of transparency and good customer outcomes, an applicant may request a copy of this register to ensure there are no lender conflicts.

TIERED SERVICING DISCLOSURES

We have access to service programs available from some residential home loan providers. We access these services based on a number of measures. These programs promote preferential services to a client and do not entitle us to additional payments or commissions or to preferential client discounts.

Privacy Statement

We understand the importance of, and are committed to, complying with our obligations under the *Privacy Act 1988 (Cth)* (“Privacy Act”) and the associated *Australian Privacy Principles* (“APP”). This document sets out our condensed Privacy Notice.

We need to collect personal information about you to provide you with our broking and related services. This privacy statement tells you how we collect your information, for what we use the information and with whom we share the information. If we collect information that can be used to identify you, we will take reasonable steps to notify you of that collection.

You appoint us your agent (Access Seeker) to obtain your credit information from a credit reporting body on your behalf and for the purpose of assisting you with your finance application. You authorise us to disclose any credit information we obtain to prospective financiers in connection with your finance application.

Sensitive information

Sensitive information is any information about a person’s racial or ethnic origin, political opinion, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record or health information. We will not ask you to disclose sensitive information, but if you elect to provide sensitive information it will also be captured and stored.

How information is collected from you

We will collect your information from you directly whenever we can, like from enquiries we make of you when you seek credit assistance from us. We may verify that information from sources referred to in the responses to those enquiries or in this privacy statement.

How information is collected from other sources

Sometimes we will collect information about you from other sources as the *Privacy Act 1988* permits. We will do this only if it is reasonably necessary to do so, for example, where:

- we collect information from third parties about a loan or lease in relation to which you seek our services;
- we cannot get hold of you and we rely on public information (for example, from public registers or social media) or made available by third parties to update your contact details; or
- we exchange information with your legal or financial advisers or other representatives.

When the law authorises or requires collection of information

Some law may require us to collect personal information about you. For example, we may require your information to verify your identity under Australian Anti-Money Laundering law.

What information do we collect and hold?

The types of information that we collect and hold about you could include identification information such as your name, postal or email address, telephone numbers, date of birth; other contact details such as social media handles; financial details and other information we think is necessary.

How your information may be used

We may use your information for purposes including:

- providing you credit assistance;
- providing you information about loan products or related services including help, guidance and advice;

- considering whether you are eligible for a loan or lease or any related service you requested including identifying or verifying you or your authority to act on behalf of a customer;
- assisting you to prepare an application for a lease or a loan;
- administering services we provide, for example, to answer requests or deal with complaints;
- administering payments we receive, or any payments we make, relating to your loan or lease;
- informing you about other products or services we make available and that may be of interest to you, unless you tell us not to;
- identifying opportunities to improve our service to you and improving our service to you;
- informing you about other suppliers, with whom we have arrangements, that supply goods or services that may be of interest to you;
- allowing us to run our business efficiently and perform general administrative tasks;
- preventing or investigating any fraud or crime or any suspected fraud or crime;
- as required by law, regulation or codes binding us; and
- any purpose to which you have consented.

You can let us know at any time if you no longer wish to receive direct marketing offers from us. We will process your request as soon as practicable.

What happens if you do not provide information?

If you do not provide your information to us, it may not be possible to:

- assist in finding a loan or lease relevant to your circumstances;
- verify your identity or protect against fraud; or
- let you know about products or services that might be suitable for your financial needs.

Sharing Your Information

General

We may use and share your information with other organisations for any purpose described above.

Sharing with your representatives and referees

We may share your information with:

- your representative or any person acting on your behalf (for example, lawyers, settlement agents, accountants or real estate agents); and
- your referees, like your employer, to confirm details about you.

Sharing with third parties

We may share your information with third parties in relation to services we provide to you or goods or services in which we reasonably consider you may be interested. Those third parties may include:

- the Broker Group through which we may submit loan or lease applications to lenders or lessors on the Broker Group's panel. You can view our Broker Group's privacy notice at <http://www.choiceaggregation.com.au/privacy>. It sets out how that Broker Group manages your personal information and where you can find its privacy policy;
- the licensee, ROL that authorises us to engage in credit activities. You can view ROL's privacy policy at: <http://www.freedomaggregation.com.au/privacy-policy/>. It sets out how ROL manages your personal information;
- referrers that referred your business to us;
- financial services suppliers with whom we have arrangements;
- valuers;
- lenders, lessors, lender's mortgage insurers and other loan or lease intermediaries;
- organisations, like fraud reporting agencies, that may identify, investigate and/or prevent fraud, suspected fraud, crimes, suspected crimes, or other misconduct;

- government or regulatory bodies as required or authorised by law. In some instances, these bodies may share the information with relevant foreign authorities;
- guarantors and prospective guarantors of your loan or lease;
- service providers, agents, contractors and advisers that assist us to conduct our business for purposes including, without limitation, storing or analysing information;
- any organisation that wishes to take an interest in our business or assets; and
- any third party to which you consent to us sharing your information.

Sharing outside of Australia

Some of the recipients to whom we disclose your personal information may be based overseas, including in India and the Philippines. Australian Privacy Principle (APP) 8.1 shall not apply to the disclosure, meaning that we will not be obliged under the Privacy Act to ensure that an overseas recipient does not breach the APP. In addition, if that overseas recipient handles the information in breach of the APP, we will not be accountable for that breach and you will not be able to seek redress under the Privacy Act. In addition, we may store your information in cloud or other types of networked or electronic storage. As electronic or networked storage can be accessed from various countries via an internet connection, it is not always practicable to know in which country your information may be held.

Digital consent

By providing us with your email address, you consent to us:

- communicating with you via your email address;
- sending you documents electronically by way of email; and
- retrieving electronic signatures from you for the purposes of executing documents in connection with our services.

You can at any time request to receive any document via post or other means, as notified to your broker.

Privacy Policy

You can find out more about how we manage your information by reading our Privacy Policy available by contacting us. Please see our contact details above. Our Privacy Policy sets out how you can ask us to access and seek to correct information we hold about you and how you may complain about any breach by ROL of the APPs or an applicable APP Code.

Information about other people

If you give information to us about another person (like your co-applicant) in relation to the services we provide, you will let that other person know that:

- we have collected their information to provide those services or for any other purpose set out in this privacy notice;
- we may exchange this information with other organisations set out in this privacy notice;
- we handle their personal information in the way set out in our Privacy Policy and this privacy notice and they can:
 - access or request a copy of that privacy policy or this privacy notice; or
 - access the information we hold about that other person,by using our contact details above; and
- we may not be able to provide those services to you unless we obtain their information.

By signing this document, you confirm the following:

1. The information you provide will be held by us and our broker group, Choice.
2. You appoint us your agent to obtain your credit information from a credit reporting body on your behalf.
3. You provide us, our employees, and our agents permission to contact your employer/s, accountant, superannuation provider or anyone else as required for the purpose of verifying details supplied by you.
4. We may use credit information and any other information you provide to arrange or provide finance and other services.
5. We may exchange the information with the following types of entities, some of which are located overseas:
 - Persons who provide finance or other products to you, or to whom an application has been made for those products.
 - Financial consultants, accountants, lawyers and advisers.
 - Any industry body, tribunal, court or otherwise in connection with any complaint regarding our services.
 - Any person where we are required by law to do so.
 - Any of our associates, related entities, contractors and outsourcing partners some of which are located in the Philippines and India.
 - Your referees, such as your employer, to verify information you have provided.
 - Any person considering acquiring an interest in our business or assets.
 - Any organisation providing online verification of your identity.

By signing below, you confirm that you are authorised to provide the personal details presented and consent to your information being checked with the document issuer or official record holder via third party systems for the purpose of confirming your identity.

Signature/s

Applicant 1

Name

Signature

Date

/ /

Applicant 2

Name

Signature

Date

/ /